

RECEIVED

MAY 2 2007

Columbia Gas
Transmission

A NiSource Company

Reed D. Robinson
Vice President
Engineering Services

1700 MacCorkle Avenue SE
P. O. Box 1273
Charleston, WV 25325
(304) 357.3806
Cellular: (304) 549.1574
Fax: (304) 357.2644
rdrobinson@nisource.com

May 1, 2007

Mr. Byron Coy
Regional Director Eastern Region
Pipeline and Hazardous Materials Safety Administration
820 Bear Tavern Road, Suite 306
West Trenton, NJ 08628

Re: CPF 1-2007-1004 Notice of Probable Violation and Civil Penalty
2005 WVPSC Inspections

Dear Mr. Coy:

Columbia Gas Transmission Corporation (Columbia) has received the referenced PHMSA Notice of Probable Violation (NOPV) and Civil Penalty dated April 5, 2007 for West Virginia Public Service Commission inspections conducted in 2005.

Under the Procedures for Responding to a Notice of Probable Violation, Section 1(a) (2) allows for submission of written explanations, information, and other materials in response to the allegations and/or seek elimination or mitigation of the proposed civil penalty. Columbia respectfully submits the following materials for Item 9 of the NOPV.

Item 9 of the NOPV states:

§192.739 Pressure Limiting and Regulating Stations: Inspection and Testing

(a) Each pressure limiting station, relief device (except rupture discs), and pressure regulating station and its equipment must be subjected at intervals not exceeding 15 months, but at least once each calendar year, to inspections and tests to determine that it is -

- (1) In good mechanical condition;
- (2) Adequate from the standpoint of capacity and reliability of operation for the service in which it is employed;

Columbia failed to provide any records to document the annual inspections and testing for the devices (monitor-regulator followed by a control unit) located at regulator station RS-6821 on Line 18044 in Rowlesburg, Preston County.

No records were found for any inspection at that regulator station between 2002 and 2005.

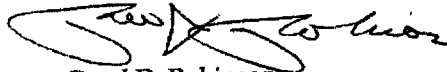
Columbia Response:

The records for inspection and testing of RS-6821 for years 2002 through 2005 are attached for review. Columbia requests that Item 9 be removed from the NOPV along with the associated civil penalty.

Page Two
Byron Coy
May 1, 2007

Please contact William Butterworth, Manager Engineering Services at (540)465-6425 or David Anderson, Principal Engineer at (724)223-2766 if you need further information.

Respectfully yours,

A handwritten signature in black ink, appearing to read "Reed D. Robinson", with a stylized flourish at the end.

Reed D. Robinson

Attachments

cc: D. Anderson
W. Butterworth
D. Kirkland
M. Wendorff

**2002-2005 Maximo Records for control and monitor regulator at RS-6821,
Line PL-18044 in Rowlesburg, Preston County, WV.**

EQUUM: 756487		REGULATOR, SELF OPERATED - CONTROL - 1A MONITOR	
REGULATOR, SELF OPERATED - INSPECTION			
11213708	6/2/05	WBLAYTON	ENTER THE INLET PRESSURE IN PSIG (XXXX.X). 369.00 ENTER THE OUTLET PRESSURE IN PSIG (XXXX.X). 369.00 ENTER THE AS FOUND SET PRESSURE IN PSIG (XXXX.X). 50.00 DID THE REGULATOR ACHIEVE LOCK-UP? RECORD YES OR NO, (Y OR N). y
			ENTER THE AS LEFT INLET PRESSURE IN PSIG (XXXX.X). 369.00 ENTER THE AS LEFT OPERATING PRESSURE IN PSIG (XXXX.X). 369.00 ENTER THE AS LEFT SET PRESSURE IN PSIG, (XXXX.X). 50.00
1567889	7/21/04	WBLAYTON	ENTER THE INLET PRESSURE IN PSIG (XXXX.X). 368.00 ENTER THE OUTLET PRESSURE IN PSIG (XXXX.X). 368.00 ENTER THE "AS FOUND" SET PRESSURE IN PSIG (XXXX.X). 50.00 DID THE REGULATOR ACHIEVE LOCK-UP? RECORD YES OR NO, (Y OR N). yes
			ENTER THE "AS LEFT" INLET PRESSURE IN PSIG (XXXX.X). 368.00 ENTER THE "AS LEFT" OPERATING PRESSURE IN PSIG (XXXX.X). 368.00 ENTER THE "AS LEFT" SET PRESSURE IN PSIG, (XXXX.X). 50.00
1088908	9/18/03	KWALLS	
606263	6/20/02	RKITZMILLER	
EQUUM: 756488		REGULATOR, SELF OPERATED - CONTROL - 2A CONTROL	
REGULATOR, SELF OPERATED - INSPECTION			
11213729	6/2/05	WBLAYTON	ENTER THE INLET PRESSURE IN PSIG (XXXX.X). 369.00 ENTER THE OUTLET PRESSURE IN PSIG (XXXX.X). 43.00 ENTER THE AS FOUND SET PRESSURE IN PSIG (XXXX.X). 44.00 DID THE REGULATOR ACHIEVE LOCK-UP? RECORD YES OR NO, (Y OR N). y
			ENTER THE AS LEFT INLET PRESSURE IN PSIG (XXXX.X). 369.00 ENTER THE AS LEFT OPERATING PRESSURE IN PSIG (XXXX.X). 44.00 ENTER THE AS LEFT SET PRESSURE IN PSIG, (XXXX.X). 45.00
1567890	7/21/04	WBLAYTON	ENTER THE INLET PRESSURE IN PSIG (XXXX.X). 368.00 ENTER THE OUTLET PRESSURE IN PSIG (XXXX.X). 44.00 ENTER THE "AS FOUND" SET PRESSURE IN PSIG (XXXX.X). 43.00 DID THE REGULATOR ACHIEVE LOCK-UP? RECORD YES OR NO, (Y OR N). yes
			ENTER THE "AS LEFT" INLET PRESSURE IN PSIG (XXXX.X). 368.00 ENTER THE "AS LEFT" OPERATING PRESSURE IN PSIG (XXXX.X). 44.00 ENTER THE "AS LEFT" SET PRESSURE IN PSIG, (XXXX.X). 45.00
1088909	9/18/03	KWALLS	
606264	6/20/02	RKITZMILLER	

Note: Please see attached 2002-2003 field inspection records.

REGULATOR STATION INSPECTION REPORT

STATION NAME Rowlesburg		STATION NUMBER 601821		DATE 6-20-02	TIME 10:00
STATION LOCATION 2.18044 Above Rowlesburg		CLASSIFICATION TRANS		LEAKAGE BEFORE VENTING 0 %	
SCHEDULED INSPECTION <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO (EXPLAIN IN REMARKS)		REGULATION AS FOUND <input checked="" type="checkbox"/> NORMAL <input type="checkbox"/> ABNORMAL (EXPLAIN IN REMARKS)			
Regulator Number → 1A 2A					
Function Monitor Control					
Size and Model 2" W 461 502" ALU Reg 39					
Inlet Pressure (psig)	352	352	352	352	
Outlet Pressure (psig) (psig, w.c.)	352	352	440	450	
Monitor Set Point (psig, w.c.)	50	50	50	50	
Instr. Supply Pressure (psig)	N/A	N/A	N/A	N/A	
Instr. Output Pressure (psig)	N/A	N/A	N/A	N/A	
Inner Valve Position	100%	100%	10%	10%	
ITEMS INSPECTED: "OK" OR EXPLAIN IN REMARKS					
Instruments or Pilots	N/A	N/A			
Gages	N/A	N/A			
Auxiliary Regulators	N/A	N/A			
Filters and/or Dryers	N/A	N/A			
Diaphragms	OK	OK			
Valves and Seats	OK	OK			
Stem and/or Stem Seal	OK	OK			
Vents and Vent Lines	OK	OK			
Control & Supply Lines	OK	OK			
Operational Check as Left	OK	OK			
OTHER ITEMS INSPECTED: WRITE "YES" "NO" OR EXPLAIN					
Shut Off Valves: YES	Lubricated: YES	Sealed: NO	Locked: YES		
Bypass Valves: YES	Lubricated: YES	Sealed: NO	Locked: YES		
SCRUBBERS: N/A	HEATERS: N/A	SAFETY DEVICES: YES N/A			
Type	Type WATER Bath	Size and Type			
Inspected	Operating NO	Shut Off Valve Opened & Secured			
Cleaned	Inspected YES	Set Press. In. w.c. or psig.			
Controls Ckd.	Cleaned NO	Relieved to In. w.c. or psig.			
	Burner Ckd. YES	Operation Satisfactory			
Fencing OK	Building N/A	LG. OK	Atmospheric Corrosion <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO		
REMARKS:					
INSPECTED BY: [Signature] SMARSH REVIEWED BY:					
DUPLICATE					

COLUMBIA GAS SYSTEM REGULATOR STATION INSPECTION REPORT

STATION NAME ROULES BURG		STATION NUMBER 6821		DATE 7-18-05		TIME 11:15	
STATION LOCATION 218044 @ ROULES BURG		CLASSIFICATION TRANS		LEAKAGE BEFORE TESTING 0			
SCHEDULED INSPECTION <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO (EXPLAIN IN REMARKS)		REGULATION AS FOUND <input checked="" type="checkbox"/> NORMAL <input type="checkbox"/> ABNORMAL (EXPLAIN IN REMARKS)					
Regulator Number →		1A		2A			
Function		1100TDRY ONT					
Size and Model		1" RK 461		1" RK 461/575			
Inlet Pressure (psig)		350		350			
Outlet Pressure (psig. or in. w.c.)		350		42.0			
Monitor Set Point (psig. or in. w.c.)		50		NA			
Instr. Supply Pressure (psig)		NA		NA			
Instr. Output Pressure (psig)		NA		NA			
Inner Valve Position		90° OPEN		50° OPEN			
ITEMS INSPECTED: "OK" OR EXPLAIN IN REMARKS							
Instruments or Pilots		NA		NA			
Gages		NA		NA			
Auxiliary Regulators		NA		NA			
Filters and/or Dryers		NA		NA			
Diaphragms		BUBBLE LEAK TEST		OK			
Valves and Seats		NI		NI			
Stem and/or Stem Seal		NI		NI			
Vents and Vent Lines		OK		OK			
Control & Supply Lines		OK		OK			
Operational Check as Left		OK		OK			
OTHER ITEMS INSPECTED: WRITE "YES" "NO" OR EXPLAIN							
Shut Off Valves:		Lubricated		Sealed		Sealed	
Bypass Valves:		Lubricated		Sealed		Sealed	
SCRUBBERS:		HEATERS:		SAFETY DEVICES:			
Type NA		Type NI		Size and Type NA			
Inspected		Operating		Shut Off Valve Opened & Secured			
Cleaned		Inspected		Set Press. _____ in. w.c. or _____ psig.			
Controls Ckd.		Cleaned		Relieved at _____ in. w.c. or _____ psig.			
		Burner Ckd.		Operation Satisfactory			
Fencing		Building		Lot		Atmospheric Corrosion <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	
REMARKS: ANNUAL INSPECTION CHECK FOR CHECK SET PT ON NIGHT LOCKUP							
INSPECTED BY: HW - GC				REVIEWED BY:			

DUPLICATE